

Opening Remarks for Veolia Public Hearing

Good afternoon everybody. My name is David Ogulei and I am an environmental engineer at the Chicago office of the EPA.

Veolia's Sauget, Illinois facility is a treatment, storage and disposal facility which accepts waste for disposal through incineration. Veolia receives containers and bulk shipments of hazardous and solid wastes; analyzes and transfers the waste to temporary storage facilities; and processes and incinerates it in three combustion units. The waste that Veolia receives is varied, and can contain differing amounts of hazardous materials.

The Clean Air Act requires an operating permit – known as a Title V permit – for facilities that emit or have the capacity to emit large amounts of air pollution and for certain types of facilities that must comply with specific federal standards. Veolia is required to get a Title V permit because it is a major source of hazardous air pollutant emissions and is subject to one of the National Emission Standards for Hazardous Air Pollutants. This permit details the amount of pollution the facility can emit and what it must do to control the pollution. A Title V permit is valid for five years and may be renewed in five-year increments.

As I will describe in more detail in a few minutes, EPA is proposing to renew the Title V operating permit for Veolia ES Technical Solutions L.L.C.

Background

EPA issued a Title V permit to Veolia on September 12, 2008, and the permit became effective on October 12, 2008. Prior to issuing the permit, EPA reviewed historical metal feedrate data supplied by Veolia. The term “feedrate” describes the amount of waste that Veolia burns in

its combustion units. EPA concluded that the data provided by Veolia was not reliable for determining feedrate limits (also called operating parameter limits or OPLs) for heavy metals such as mercury, lead, cadmium, arsenic, chromium and beryllium. Feedrate limits set the maximum amount of specific types of waste - here, heavy metals - that Veolia can feed into its incinerators per hour.

Because EPA found the data unreliable, EPA issued Veolia's permit without including feedrate limits for mercury, lead, cadmium, arsenic, chromium or beryllium. However, as required by the federal regulations governing hazardous waste combustors, EPA included in the permit a compliance schedule that required Veolia to test all three combustors to develop feedrate limits for emissions of mercury, low-volatile metals (that is, arsenic, chromium and beryllium) and semi-volatile metals (that is, lead and cadmium).

Veolia conducted the required comprehensive performance tests in August and September 2008. EPA reviewed the results and in January 2013, EPA began a process to revise the 2008 permit, but later chose to simply incorporate the proposed changes into Veolia's permit renewal.

So, what is EPA proposing?

EPA is proposing to make changes and renew the existing Title V operating permit for Veolia. The proposed permit contains all the emissions limitations and standards to which the source is subject and will ensure that there is enough monitoring and recordkeeping required to verify that the source is in compliance with permit requirements.

EPA is adding the feedrate limits for mercury, lead, cadmium, arsenic, chromium and beryllium that were omitted from Veolia's 2008 permit and updating other operating parameter limits as required by federal regulations for hazardous waste combustors. The feedrate limits were established using the results of Veolia's October 2013 comprehensive performance tests, and Veolia already is required to comply with the

limits under the NESHAP for hazardous waste combustors, the “HWC MACT.” To ensure compliance with these metal feedrate limits, EPA has also proposed to improve Veolia’s feedstream analysis procedures. The additional analysis procedures proposed by EPA would supplement any other analysis procedures for mercury, semi-volatile metals and low-volatile metals as specified in Veolia’s feedstream analysis plan, known as a FAP, and would supersede any less stringent provisions in the FAP.

Incorporation of the additional feedstream analysis procedures into the Title V permit would not eliminate Veolia’s obligation to maintain an adequate FAP, consistent with federal regulations for hazardous waste combustors.

Additionally, EPA is proposing to require Veolia to temporarily install and operate a continuous emissions monitoring system, or CEMS, on each of its three combustion units. Veolia will operate the CEMSs as parametric monitoring systems to assess whether the operating parameter limits for specific metals are adequate to ensure compliance with federal rules. As parametric monitoring systems, the CEMSs will verify the adequacy of the feedrate limits. The systems will test the air emitted during incineration to determine the amount of mercury, semi-volatile metals, low-volatile metals and other metals emitted, and report results approximately once every 15 minutes.

The test results will help U.S. EPA ensure the feedrate limits in the permit are adequate to protect air quality and that the feedrate limits are adequate to ensure compliance with the HWC MACT. EPA will require Veolia to operate the CEMSs for no less than 12 consecutive months or until EPA has enough information to determine if the proposed feedrate limits are adequate to ensure Veolia complies with the Clean Air Act.

Once EPA has collected sufficient information, EPA will no longer require Veolia to use multi-metal CEMSs.

EPA is also removing some requirements that no longer apply. For example, an emission limit previously included in the permit to meet federal standards for the boiler is no longer applicable because EPA has promulgated new federal standards that apply to the boiler. EPA is therefore replacing that emissions limit with the new federal standards for boilers.

As Ms. Damico noted, we will not answer any questions or respond to any comments today. However, after the close of the comment period, we will respond in writing to each written or oral comment filed today, and any comments submitted before the close of the public comment period. Our responses will be contained in a response to comments document that we will distribute to each person who files comments or requests to receive a copy of the final permit. Please note that only portions of the permit that are being changed because of the proposed action are open for comment during the public comment period.